

BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Revision of the Commission's  
rules to ensure compatibility  
with enhanced 911 emergency  
calling systems

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CC Docket No. 94-102  
RM-81403

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To: The Commission

REPLY COMMENTS  
OF  
THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.  
AND  
THE INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

The International Association of Fire Chiefs, Inc.  
(IAFC) and the International Municipal Signal Association  
(IMSA) respectfully submit these Reply Comments in  
conjunction with the Commission's proposal to revise its  
rules to ensure compatibility of private branch exchange  
equipment and wireless services with enhanced 911 emergency  
calling systems.

**I. INTRODUCTORY STATEMENT.**

IMSA is a non-profit organization dedicated to the  
development and use of electrical signaling and  
communications systems in the furtherance of public safety.  
The members of IMSA include representatives of federal,  
state, county, city, township and borough governmental  
bodies and representatives of governmental bodies from  
foreign nations. Organized in 1896, IMSA is the oldest

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organization in the world dedicated to the activities pertaining to electrical engineering, including the Public Safety use of radio technology.

IAFC is a voluntary, professional membership society. Its approximately 9,000 members comprised of senior Fire Service officials are dedicated to the protection of life and property throughout the United States and abroad. IAFC is the major national professional association representing the interests of senior management in the Fire Service.

IAFC and IMSA are recognized as the frequency coordinating committee for the Fire Radio Service and, in conjunction with National Association of Business and Educational Radio, Inc. (NABER), constitute the recognized coordinating committee for the Special Emergency Radio Service ("SERS"). Moreover, IMSA and IAFC members and their respective public safety agencies operate Public Safety Answering Points (PSAPs) and rely on 911 emergency calling systems for receipt of emergency notifications from the general public. IMSA and IAFC regularly express their views before the Commission on issues affecting the Public Safety and Special Emergency Radio Service.

## **II. REPLY COMMENTS**

IAFC and IMSA support the Commission's proposal to adopt protocols to assure that the nationally standardized emergency calling system and its enhanced service features

are available to the public at large, whether the user be located at a traditionally wired telephone, at an office or plant location served by some form of private branch exchange, or roaming within or outside of his or her home community and communicating through a cellular or other commercial mobile radio service provider. As technological advancement increases the opportunities for and manner of use of the telephone network, it is essential that system features, as encouraged or mandated by regulatory policies, continue to assure the availability to telecommunications users of the enhanced 911 emergency communications service. This goal is derived from Section 1 of the Communications Act, which sets forth as primary among the purposes of the Act in the creation of the Federal Communications Commission "to make available, so far as possible, to all the people of the United States a rapid, efficient, Nation-wide and world-wide wire and radio communications service with adequate facilities at reasonable charges, ... for the purpose of promoting safety of life and property through the use of wire and radio communication ..."<sup>1/</sup>

The comments filed in this proceeding generally support the adoption of standards enforcing compatibility of PBX and commercial mobile radio service systems with enhanced 911

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<sup>1/</sup> 47 U.S.C. § 151.

emergency services. IMSA and IAFC will not burden the record with a recitation of the individual compatibility issues addressed in the Notice, other than four (4) priority issues of particular interest in the disposition of this proceeding.

The Commission discusses the issue of 911 availability in wireless systems and proposes that any wireless user who has purchased service from a wireless service provider be enabled to make a 911 call without a requirement for user validation. This is particularly important with regard to roamers. Numerous individuals carry cellular telephones when they travel, primarily for 911 access purposes. The institution of cellular radio service has provided a strategic enhancement to the safety of the travelling public; and the Commission needs to assure that those benefits are available if and when emergency calling is required. Accordingly, IAFC and IMSA urge the Commission to require that 911 calls may be processed without any necessity for use of PIN codes or "service initialization" with the host cellular provider when the user operates in a roaming mode. This should not be objectionable to CMRS service providers inasmuch as there is virtually no opportunity for fraud by virtue that the calls will terminate at a Public Safety Answering Point and so will not provide an opportunity for fraudulent use of cellular

services. Moreover, 911 emergency calling should be an inherent feature of any cellular, PCS or similar CMRS operation as a participant in the national information infrastructure.<sup>2/</sup>

Second, the Commission requests comments on whether to preempt state requirements. IMSA and IAFC note that many states and localities have established operating and compatibility requirements with regard to their enhanced 911 emergency services. These requirements are crafted to meet local requirements and operating conditions. Accordingly, the Commission's regulations should constitute minimal requirements; and any additional or specific requirements enclosed by state and local governments need to have continued viability since those requirements are keyed to local 911 emergency response system operations.

Third, IAFC and IMSA fully support the Commission's proposal to require, within three (3) years, call-back capability so that Public Safety Answering Points may return calls to commercial mobile radio service users. Especially in the mobile environment, wherein the Commission proposes to require that calls be routed to the nearest PSAP, it is

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<sup>2/</sup> By analogy, all interstate common carriers, including wireless, paging, satellite, video and telex carriers, must support the Telecommunications Relay Services (CC Doc. 90-571). Enhanced 911 emergency calling is no less important than TRS service from a public interest standpoint.

critical in the event of a disconnect that the PSAP initially handling the call be capable of reinstating contact since a change in the caller's location may result in the caller being directed to a different PSAP. IMSA and IAFC believe the 3-year transition period for institution of this feature is reasonable.


Fourth, related to the issue of access to 911 emergency calling systems is the issue, in the mobile environment, of emergency responders' access to the wireless network. Priority access should be accorded not only to 911 callers, but also to specifically identified (e.g., locally certified) emergency responders. There have been incidents wherein the news media, arriving on an accident scene, have seized cellular channels and held them open, to the effect of precluding first responders from calling through the cellular system for additional assistance. Priority access by public safety, as well as for public safety assistance, is crucial to realize the full implementation benefits of wireless telecommunications systems and services.

Finally, IAFC and IMSA take note of the comments of various satellite and other specialized CMRS providers and equipment manufacturers with regard to the inapplicability of requiring enhanced 911 emergency calling capability for those systems. In particular, the identified systems include air-ground, maritime and automated maritime, paging,

Inmarsat and mobile satellite, and SMR services. With regard to those voice services, the nature of the mobile systems and their points of interconnection with the landline telephone network have no particular relationship to 911 calling capability or PSAP locations. Accordingly, those services and systems should be exempted from the rules and requirements adopted in this proceeding.

**WHEREFORE, THE PREMISES CONSIDERED,** the International Municipal Signal Association and the International Association of Fire Chiefs, Inc. respectfully request that the Federal Communications Commission dispose of this rulemaking consistent with the foregoing.

Respectfully Submitted,



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